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Mr. Dan Ray
CALFED
1416 9th Street, Room 630
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Subject: Comments on Proposal #231 Riparian Restoration Planning and Feasibility Study for the Riparian Sanctuary, Llano Seco Unit, Sacramento River National Wildlife Refuge

Dear Mr. Ray:

Sacramento River Partners worked with the US Fish and Wildlife Service to develop the above referenced proposal. The 500-acre site offers great habitat potential if restored, and this proposal outlines a model planning approach for restoration, pumping plant protection, and an interdisciplinary monitoring program. The modest amount requested would complete the planning and have a "ready to go" project.

As the proposed project has good support and is important ecologically, we were puzzled that the panel did not recommend the project for funding. We wish to comment on several statements made in the Research and Restoration Technical Panel Review and hope that our comments will be adequately addressed.

Comments (quotations indicate statements from the Proposal Reviews):

1) "Reviewers ranked the proposal as good *or lower* and the regional review ranked it as medium" (emphasis ours).

Each of the three external reviewers gave the project an Overall Evaluation Summary Rating of good. It is inaccurate to add the "or lower" to the statement (just as it would be inaccurate to state that the proposal ranked good "or higher"). The panel noted, "It was not clear why the proposal was not rated high." The regional and technical reviews were generally good rankings with concrete suggestions. The Panel provided generally vague and poorly supported statements in its "Not Recommended" ranking, which makes it difficult to improve the proposal for the future.

2) "The proposal is a modest proposal for a planning process to restore 77 acres and deal with a pumping station."

As stated in the Executive Summary and Project Description, the project encompasses 500 acres of the 950-acre USFWS Riparian Sanctuary. We could find no reference in the proposal to 77 acres, yet the review repeated this value. The magnitude of the project matters, the habitat benefits of 500-acres (and 8,500 linear feet of streambank) are much greater than a 77 acre project.

3) "The focus of much of the proposal is dealing with the pumping station and bank hardening and less about the ecosystem restoration. Most of the discussion of tasks is either directly or indirectly linked to the pumping station."

The statement misrepresents the project. The examination of remedies for the Princeton, Cordora, Glenn, and Provident Irrigation Districts' (PCGID-PID) fish screen and pumping station, is certainly an important component of the project, but the proposal makes it clear that this is one of three main planning tasks. Certainly, the reader will have to discern the priority from actually reading the proposal, but the restoration of the 500 acres is the proposal's top priority. For example, the budget reflects a fair assessment of the relative effort, technical complexity, and public outreach for each planning task:

Task	Budget %
Riparian Restoration Plan	56
Pumping Plant and Fish Screen Protection Plan	17
Interdisciplinary Monitoring Plan	27

Likewise, a word count of the Conceptual Site Model and the Description of Tasks indicates that only 14% of the space in these sections is devoted to the pumping station and fish screen.

In either case, although the task is relatively small, it is important because the proposed project represents a unique opportunity for the USFWS and PCGID-PID to work proactively toward a plan that meets ecological, economic, and hydraulic objectives. Without this component, bank protection efforts for the pumping station are likely to proceed along only narrow objectives (i.e. an emergency action), without full consideration of ecological objectives and how it fits in with the restoration of the 500 acres. The proposal also offers an excellent opportunity to work with stakeholders through the Sacramento River Conservation Area Forum. We would hope that CALFED would support an inclusive process to develop ecologically and hydraulically sound methods to protect the fish screens and pumping station and provide for better habitat than the currently revetted bank, and are disappointed that this has been evaluated as a negative attribute of the proposal.

4) "Much of the hydraulic analysis is limited to the flows in the immediate vicinity of the station. The analyses may overlook the hydraulics of the larger reach."

This statement grossly underestimates the hydraulic assessment associated with the proposal, and suggests unfamiliarity with either hydraulic modeling or with the actual proposal. The project area rests between River Mile (RM) 176.5-178.5 and certainly local impacts will be considered, but an important task of the proposal (Task 1.2) is to contract with Ayres Associates to expand an existing state-of-the-art two-dimensional hydrodynamic model to look at impacts associated with restoration on the site and the effects of the cumulative impacts of restoration between RM 172 to 194. An examination of 22 River Miles and inclusion of all current restoration and land proposed for restoration in public ownership and conservation easements would certainly capture the effects of restoration on the project area. Using the best available tools to date, the "hydraulics of the larger reach" will certainly not be overlooked.

5) "The planning process is commendable, but support by CALFED seems questionable."

On its merits and approach, this project would seem exactly the type of project CALFED would support. For the modest cost of the planning effort, the project has high expectations and benefits, such as:

- Cooperation between a federal agency, a local non-profit, two irrigation districts, and local stakeholders,
- Collaboration between nearly 20 recognized expert scientists to develop a comprehensive experimental design and monitoring program built into a 500 acre restoration project,
- A locally driven, transparent, inclusive planning process that works with stakeholders through the SRCA forum and other venues and incorporates their comments into project plans,
- A hydraulic examination of the project and cumulative impacts of 22 river miles,
- Scientifically-based plans that develop comprehensive solutions to restore 500 acres (which includes 8,500 feet of streambank) of publicly-owned land, transform a revetted bank to provide ecological benefits and protection for the fish screen and pumping station, and develop a solid scientific understanding of ecological processes associated with restoration on California rivers.

We would like the panel to provide concrete reasons why CALFED support for the project "seems questionable".

6) "There are no relevant hypothesis."

Please clarify this statement. This statement appears to have been taken out of context from one of the reviewers. As one of the reviewers stated, "This is a planning study, Making predictions and testing those predictions are not *relevant* to this study" [emphasis ours]. We made hypotheses that were related to the planning process rather than more traditional hypothesis testing.

7) "Several reviewers noted that the proposal did not explicitly identify alternatives for actions."

Because we wish to have genuine public involvement, we thought it inappropriate to develop proposed alternatives, when part of the scoping process is to explore alternatives.

8) "The project is generally consistent with the understanding of the Bay Delta Watershed, but it will not add information that is unique or addresses processes that are poorly understood."

The interdisciplinary plan will examine the potential to build the future restoration of 500 acre around an experimental design to look at the effects of revegetation on wildlife usage (including bird and rodent populations), sedimentation and erosion, hydraulic effects, changes in organic matter, water use, invasive weed biology, and the development of salmonid fishery habitat, successional processes, etc. Not all of these factors are likely to be evaluated, but the potential for building it into the project will be examined.

This project provides a unique opportunity to concretely address these issues, and the information will be invaluable for scientists throughout the state. We ask the panel to cite a single restoration project of this size (or any size) that examines the issues through an experimental design that is built into the project.

We feel that this proposal represents a state of the art site-specific planning effort that takes into account local concerns, and brings to the project, partners with a wide variety of expertise. We hope that the proposal and our comments receive due consideration.

Sincerely,



Dan Eiseff
Restoration Ecologist